

April 7, 2017

Charles Palmer
Civil Rights Coordinator
Los Angeles County Department of Public Social Services
12860 Crossroads Parkway South
City of Industry, CA 91746

Dear Mr. Palmer:

This letter is to advise you that the final update to the Corrective Action Plan submitted by Los Angeles County on April 5, 2017, in response to the results of our 2015 Civil Rights Compliance Review is approved.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator.

If you have any questions, please contact Daniel Cervantes at (916) 654-2107. You may also contact your consultant by e-mail at Daniel.Cervantes@dss.ca.gov.

Sincerely,

Original signed by Tiffany Marsh

Tiffany Marsh, Acting Chief
Civil Rights Unit
Welfare to Work Division

c: Jessica Alfaro, Human Services Administrator I

Kim McCoy Wade, Chief
CalFresh Policy Bureau

Carlos Ocampo, Chief
Field Operations Bureau

Tami Gutierrez, Chief
CalFresh Management Operations Section

Paul Gardes
CalFresh Policy Bureau

Jacqueline Hom
State Refugee Coordinator

Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
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Andrew Riesenbergl
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Kevin Aslanian
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier
Western Center on Law and Poverty

**CDSS CIVIL RIGHTS COMPLIANCE REVIEW
FISCAL YEAR 2015-16**

**LOS ANGELES COUNTY DPSS RESPONSE TO
FINDINGS AND CORRECTIVE ACTIONS**

III. DISSEMINATION OF INFORMATION

LOS ANGELES COUNTY DPSS

REVIEW ELEMENT: SIGNAGE, POSTERS, PAMPHLETS

FINDING:

1. Distribution of CDSS' Pub 13.

COMMENTS

While reviewing case files, LADPSS employees document in the appropriate program the distribution/explanation of the pamphlet. While observing behind reception counters and other in person contact between LADPSS staff and participants, the form was provided to the client, but never explained.

CORRECTIVE ACTION:

LADPSS shall ensure that the Pub 13 pamphlet, "Your Rights Under California Welfare Programs" is both given and explained to program participants in all of the programs for which CDSS has oversight responsibility.

Div. 21-107.221

DPSS RESPONSE:

DPSS sent an email on December 28, 2015, to all District and Regional Directors reinforcing the policy contained in Civil Rights Memo (CRM) 15-02, Reception Civil Rights Compliance Policies, Procedures and Resources, dated November 24, 2015. The purpose of the CRM is to reinforce staff responsibility to be aware of and able to direct customers to the civil rights brochures such as the PUB 13 and other mandatory discrimination complaint materials.

Completed: December 28, 2015

FINDING:

2. Instructional and directional signage.

COMMENTS

All offices visited had instructional and directional signs posted in the required languages. Offices which were visited unannounced did not have translated directional and informational signage in required languages.

CORRECTIVE ACTION:

LADPSS shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages.

Div. 21-107.212 and .24

DPSS RESPONSE:

DPSS will ensure that all instructional and directional signs will be posted and translated into the appropriate languages in the waiting areas and other places that are frequented by non-English speaking clients.

Target Date: March 31, 2016

DPSS FINAL RESPONSE:

All translated directional and informational signs have been posted in the required threshold languages in waiting areas and other places that are frequented by non-English speaking clients.

Completed: January 12, 2016

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

PASADENA #03, 955 N. Lake Ave, Pasadena, CA

FACILITY ELEMENT: MEN'S RESTROOM

FINDING:

3. No accessible signage on restroom's entrance.

CORRECTIVE ACTION:

Men's toilet and bathing facilities shall be identified by an equilateral triangle, 1/4" thick with edges 12" long and a vertex pointing upward.
(CA T24 11B-703.7.2.6.1) pg. 310

DPSS RESPONSE:

The accessible signage was installed on the restroom's entrance.

Completed: July, 28, 2015

FINDING:

4. No accessible signage on wall for permanent identification.

CORRECTIVE ACTION:

Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.

(CA T24 11B-703.4.2) (ADA703.4.2) pg. 311

DPSS RESPONSE:

The accessible signage was installed on the wall.

Completed: July, 28, 2015

FINDING:

5. Door pressure excessive at 14 lbs.

CORRECTIVE ACTION:

The force required to activate operable parts shall be 5 lbs.
(CA T24 11B-309.4) (ADA 309.4) pg. 224

DPSS RESPONSE:

The door pressure was adjusted to 5 lbs.

Completed: December 2, 2015

FINDING:

6. Urinal too high at 22 inches.

CORRECTIVE ACTION:

Urinals shall be the stall-type or the wall-hung type with the rim 17" max. above the finish floor or ground. (CA T2411B-605.2) (ADA 605.2) pg. 337

Urinals shall be 13 1/2" deep min. measured from the outer face of the urinal rim to the back of the fixture. (CA T24 11B-605.2) (ADA 605.2) pg. 337

DPSS RESPONSE:

A work order was submitted to have the height of the urinal adjusted to the correct height.

Target Date: February 29, 2016

DPSS FINAL RESPONSE:

The height of the urinal was adjusted to the correct height.

Completed: March 4, 2016

FINDING:

7. Pipes underneath sink not insulated.

CORRECTIVE ACTION:

Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.

(CA T24 11B-606.5) (ADA 606.5) pg. 330

DPSS RESPONSE:

Insulation was installed to cover the drain pipes under the sink.

Completed: October 9, 2015

FACILITY ELEMENT: WOMEN'S RESTROOM

FINDING:

8. No accessible signage on restroom's entrance.

CORRECTIVE ACTION:

Women's toilet and bathing facilities shall be identified by an equilateral triangle, 1/4" thick with edges 12" long and a vertex pointing upward.

(CA T24 11B-703.7.2.6.1) pg. 310

DPSS RESPONSE:

The accessible signage was installed on the restroom's entrance.

Completed: July 28, 2015

FINDING:

9. No accessible signage on wall for permanent identification.

CORRECTIVE ACTION:

Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) pg. 311

DPSS RESPONSE:

The accessible signage was installed on the wall.

Completed: July 28, 2015

FINDING:

10. Door pressure excessive at 13 lbs.

CORRECTIVE ACTION:

The force required to activate operable parts shall be 5 lbs.

(CA T24 11B-309.4) (ADA 309.4) pg. 224

DPSS RESPONSE:

The door pressure was adjusted to 5 lbs.

Completed: December 2, 2015

FINDING:

11. Pipes underneath sink not insulated.

CORRECTIVE ACTION:

Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.
(CA T24 11B-606.5) (ADA 606.5) pg. 330

DPSS RESPONSE:

Insulation was installed to cover the drain pipes under the sink.

Completed: October 9, 2015

FINDING:

12. Base of mirror above sink too high at 48 inches.

CORRECTIVE ACTION:

Mirrors located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40" max. above the finish floor or ground.
Fig. 8 (CA T24 11B-603.3) (ADA 603.3) pg. 319

DPSS RESPONSE:

A work order was submitted to have the height of the mirrors adjusted to the correct height.

Target Date: February 29, 2016

DPSS FINAL RESPONSE:

The height of the mirrors was adjusted to the correct height.

Completed: April 8, 2016

BELVEDERE #05, 5445 Whittier Blvd., Los Angeles, CA

FACILITY ELEMENT: CLIENT LOBBY

FINDING:

13. No accessible counter in GAIN lobby #2.

CORRECTIVE ACTION:

The tops of dining surfaces and work surfaces shall be 28" min. and 34" max. above the finish floor or ground. (CA T24 11B-902.3) (ADA 902.3) pg. 55

DPSS RESPONSE:

The counter surface in GAIN Lobby #2 was adjusted to the correct height.

Completed: August 17, 2015

FACILITY ELEMENT: RESTROOM (UNISEX)

FINDING:

14. Pipes underneath sink not insulated.

CORRECTIVE ACTION:

Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.
(CA T24 11B-606.5) (ADA 606.5) pg. 330

DPSS RESPONSE:

Insulation was installed to cover the drain pipes under the sink.

Completed: August 17, 2015

METRO SPECIAL #70, 2707 S. Grand Ave., Los Angeles, CA

FACILITY ELEMENT: MEN'S RESTROOM LOBBY 1

FINDING:

15. Door pressure excessive at 12 lbs.

CORRECTIVE ACTION:

The force required to activate operable parts shall be 5 lbs.
(CA T24 11B-309.4) (ADA 309.4) pg. 224

DPSS RESPONSE:

The door pressure was adjusted to 5 lbs.

Completed: July 20, 2015

FACILITY ELEMENT: MEN'S RESTROOM LOBBY 4

FINDING:

16. Door pressure excessive at 16 lbs.

CORRECTIVE ACTION:

The force required to activate operable parts shall be 5 lbs.
(CA T24 11B-309.4) (ADA 309.4) pg. 224

DPSS RESPONSE:

The door pressure was adjusted to 5 lbs.

Completed: July 20, 2015

FACILITY ELEMENT: WOMEN'S RESTROOM LOBBY 1

FINDING:

17. Door pressure excessive at 11 lbs.

CORRECTIVE ACTION:

The force required to activate operable parts shall be 5 lbs.
(CA T24 11B-309.4) (ADA 309.4) pg. 224

DPSS RESPONSE:

The door pressure was adjusted to 5 lbs.

Completed: July 20, 2015

FACILITY ELEMENT: WOMEN'S RESTROOM LOBBY 4

FINDING:

18. Door pressure excessive at 11 lbs.

CORRECTIVE ACTION:

The force required to activate operable parts shall be 5 lbs.
(CA T24 11B-309.4) (ADA 309.4) pg. 224

DPSS RESPONSE:

The door pressure was adjusted to 5 lbs.

Completed: July 20, 2015

GAIN REGION I – WEST COUNTY, 5200 W. Century Blvd., Los Angeles, CA

FACILITY ELEMENT: UNISEX RESTROOM UPSTAIRS

FINDING:

19. Restroom does not have grab bars around toilet's perimeter.

CORRECTIVE ACTION:

Grab bars with circular cross sections shall have an outside diameter of 1/4" min. and 2" max. (CA T24 11B-609.2.1) (ADA 609.2.1) pg. 321

Grab bars with non-circular cross sections shall have a cross-section dimension of 2" max. and a perimeter dimension of 4" min. and 4.8" max.
(CA T24 11 B-609.2.2) (ADA 609.2.2) pg. 321

Grab bars shall be installed in a horizontal position, 33" min. and 36" max. above the finish floor measured to the top of the gripping surface.

(CA T24 11B-609.4) (ADA 609.4) pg. 321

DPSS RESPONSE:

A request was made to the CEO's Real Estate Division to facilitate installation of the grab bars with the building's owner.

Target Date: January 29, 2016

DPSS FINAL RESPONSE:

The grab bars were installed around the toilet's perimeter.

Completed: June 16, 2016

FINDING:

20. Toilet protector dispenser too high at 55 inches.

CORRECTIVE ACTION:

All operable parts, including coin slots, shall be 40" max. above the finish floor.
(CA T24 11B-603.5) pg. 319

DPSS RESPONSE:

A request was made to the CEO's Real Estate Division to facilitate making the adjustment of the toilet protector dispenser with the building's owner.

Target Date: January 29, 2016

DPSS FINAL RESPONSE:

The toilet protector dispenser was adjusted to the correct height.

Completed: June 16, 2016

IHSS POMONA #19, 360 E. Mission Blvd., Pomona, CA

FACILITY ELEMENT: INFORMATIONAL & DIRECTIONAL SIGNAGE

FINDING:

21. No physical findings at this location.

RECOMMENDATION:

The IHSS Pomona office located 360 E. Mission Blvd currently has three languages that exceed the 5% threshold requiring additional services at this office. Adding a fourth language, Tagalog, should be considered when translating any information/directional signage as Tagalog is nearing the 5% threshold.

DPSS RESPONSE:

All posted signage included Tagalog at the time of the review, with the exception of the Avaza poster, to which the office subsequently added a Tagalog translation.

Completed: November 24, 2015

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

LOS ANGELES COUNTY DPSS

REVIEW ELEMENT: FINDINGS FROM PROGRAM MANAGER SURVEYS, STAFF INTERVIEWS AND CASE FILE REVIEW

FINDING:

22. Bilingual staff.

CORRECTIVE ACTION:

Los Angeles DPSS shall ensure that a sufficient number of qualified bilingual employees shall be assigned to positions and locations serving a substantial number of Non-English speaking persons. Div. 21-115.1

DPSS RESPONSE:

DPSS continues to monitor/review offices' Bilingual Staffing Reports as part of the biennial Civil Rights Compliance Review. The Department monitors the reports to determine whether offices have sufficient numbers of qualified bilingual employees to serve the needs of the Non-English speaking applicants and participants. The report is being used as a review tool to assess if each individual office has sufficient number of qualified bilingual employees assigned to positions and locations serving our Limited-English Proficient (LEP) population. If an office has an insufficient number of qualified bilingual employees based on the Bilingual Authorization report, it is reported in the Civil Rights Summary of Findings Report. Offices are responsible for taking corrective action and reporting compliance 30 days after the Civil Rights Summary of Findings Report is completed.

DPSS continues to emphasize bilingual staffing compliance in the bi-annual Civil Rights Liaisons meetings and it was re-enforced through CRM 14-02, Provision of Interpretive Services and Documentation, dated September 24, 2014. In addition, district offices' bilingual allocations are caseload driven. Bilingual bonus allocations are determined and frozen on the Bilingual Authorization System semi-annually, in March and September. However, when there is a sizable caseload shift amongst offices requiring additional allocations, Office Heads request additional allocations through their Bureau Director.

The Department's Human Resources Division and Civil Rights Section conduct semi-annual reviews, where they provide Office Heads with a listing of employees receiving bilingual bonuses that needs to be updated, including necessary bilingual bonus terminations, on an ongoing process.

Completed: December 3, 2015

FINDING:

23. Effective services.

CORRECTIVE ACTION:

Los Angeles DPSS must develop and implement a policy that identifies the process to ensure effective services to applicants and recipients who are Non-English speaking or who have disabilities. Div. 21-115

DPSS RESPONSE:

DPSS released CRM 14-02, Provision of Interpretive Services and Documentation, dated September 24, 2014, and CRM 15-02, Reception Civil Rights Compliance Policies, Procedures and Resources, dated November 24, 2015. CRM 14-02 reinforces bilingual staff shall have the necessary language skills and cultural awareness to communicate fully and effectively with Non-English speaking and LEP speaking applicants and/or participants in order to provide them with the same level of service as the general client population.

CRM 15-02 further reinforces to staff the requirement to provide effective bilingual and interpretive services to meet the needs of NE speaking, LEP speaking, and hearing impaired customers. Additionally, DPSS released Call-Out 15-01, Civil Rights Compliance Provision of Language Services Improvement, dated September 10, 2015, to place additional emphasis on the effectiveness of bilingual and interpretive service delivery.

Completed: November 24, 2015

FINDING:

24. Timely services.

CORRECTIVE ACTION:

Los Angeles DPSS must ensure that bilingual/interpretive services are prompt and without undue delay. Div. 21-115

DPSS RESPONSE:

DPSS released CRM 15-02 and Call-Out 15-01 to reinforce to staff that they are required to provide effective and timely bilingual and interpretive services to NE speaking, LEP speaking, and hearing impaired customers.

Completed: November 24, 2015

FINDING:

25. Interpretive services.

CORRECTIVE ACTION:

Los Angeles DPSS must offer and provide free interpreter services using qualified interpreters. Div. 21-104q (1) and 21-115

DPSS RESPONSE:

DPSS released CRM 15-02 and Call-Out 15-01 to remind staff of the need to recognize and assist NE and LEP customers as well as the Department's responsibility to provide free interpretive services without undue delay. While customers can choose to provide their own interpreter, DPSS must not require them to do so. Free interpretive services must be offered to all NE and LEP customers, including those who speak a non-threshold language. Additionally, it has been reinforced to staff that the Department provides free American Sign Language interpretive services to customers who have hearing impairments. Offices are required to display the Civil Rights mandated "Can We Help You?" poster at their first point of entry, before office metal detection equipment, and in their reception areas.

Completed: November 24, 2015

FINDING:

26. Written materials.

CORRECTIVE ACTION:

Los Angeles DPSS must use and provide translated forms, to include translated notice of action forms, in the clients' primary languages when translated by CDSS. Div. 21-115.2

DPSS RESPONSE:

Notices of Action (NOA) are translated in the departmental threshold languages on an ongoing basis. Both LEADER and LRS generate NOAs in these languages. However, if a NOA is not translated in an applicant's/participant's threshold language, then LEADER and LRS will send a GEN 1365, Notice of Language Services, with the English version of the NOA, informing the applicant/participant to contact their county worker if they do not understand their notification.

DPSS released Manual Letter 5334, SAWS 2 PLUS (09/13) Application for CalFresh, Cash Aid, and/or Medi-Cal/Health Care Programs, dated July 24, 2014, to notify staff of the release and availability of the new SAWS 2 PLUS form, and to inform them of the need to provide it to applicants/participants in the appropriate departmental threshold language (i.e., Armenian, Cambodian, Chinese, English, Korean, Russian, Spanish, Tagalog, and Vietnamese). The SAWS 2 PLUS is an "out-of-drawer" form that is completed manually by the applicant/participant. The form is provided at intake and is mailed centrally for redeterminations. However, the SAWS 2 PLUS may be generated in English or Spanish through LEADER in instances when the applicant/participant is unable to complete it manually. Additionally, it may be accessed in all threshold languages through Forms Library in the MYDPSS Web Portal. In addition, DPSS released Administrative Release 5344, CF 285, Application for CalFresh Benefits, dated September 24, 2015, to release a revised version of the form in all threshold languages. At intake, the CF 285 is an out-of-drawer form, but for recertification, the form is mailed to participants in their threshold language.

Completed: September 24, 2015

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

LOS ANGELES COUNTY DPSS

REVIEW ELEMENT: FINDINGS FROM CASE FILE REVIEWS AND STAFF INTERVIEWS

FINDING:

27. Documentation if client provided own interpreter.

CORRECTIVE ACTION:

When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23k

DPSS RESPONSE:

DPSS released CRM 14-02 to reinforce staff responsibility to provide and document interpretive services offered and/or delivered at each applicant/participant/consumer contact. The memo reinforces to staff the purpose of form PA 481-A, Interpreter Services Statement and Confidentiality Agreement, which is to advise NE and LEP participants that there is the potential of communication errors when the interpretation process is performed by someone who is not familiar with the terms used by the different programs administered by DPSS. In addition, DPSS will reinforce to all office directors the expectations for staff on completing the PA 481 and PA 481-A, along with its filing, retention, and imaging requirements. Additionally, the communication will provide instructions for directors to ensure supervisors monitor interview areas to ensure staff is adhering to this policy.

Completed: December 28, 2015

FINDING:

28. Documentation of interpreter signed confidentiality statement.

CORRECTIVE ACTION:

Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24

DPSS RESPONSE:

DPSS released CRM 14-02 to reinforce staff responsibility to provide and document interpretive services offered and/or delivered at each applicant/participant/consumer contact. The memo reinforces to staff that form PA 481-A is intended to inform participants and their designated interpreters that the information obtained through the interpretation process is to be kept confidential. In addition, DPSS will reinforce to all office directors the expectations for staff on completing the PA 481 and PA 481-A, along with its filing, retention, and imaging requirements. Additionally, the communication will

provide instructions for directors to ensure supervisors monitor interview areas to ensure staff is adhering to this policy.

Completed: December 28, 2015

FINDING:

29. Documentation of primary language.

CORRECTIVE ACTION:

Each agency shall ensure that case record identification shows the applicants/recipient's ethnic origin and primary language. Div. 21-201.21

DPSS RESPONSE:

DPSS released CRM 14-02 to reinforce staff responsibility to provide and document interpretive services offered and/or delivered at each applicant/participant/consumer contact. The memo reinforces to staff they are to ask participants for their preferred verbal and written language communication, and document their preferred languages in their case files. In addition, DPSS will reinforce to all office directors the expectations for staff on completing the PA 481 and PA 481-A, along with its filing, retention, and imaging requirements. Additionally, the communication will provide instructions for directors to ensure supervisors monitor interview areas to ensure staff is adhering to this policy.

Completed: December 28, 2015

FINDING:

30. Documentation bilingual services were provided.

CORRECTIVE ACTION:

Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22

DPSS RESPONSE:

DPSS released CRM 14-02 to reinforce staff responsibility to provide and document interpretive services offered and/or delivered at each applicant/participant/consumer contact. The memo reinforces to staff that they must document the language that was used in providing interpretive services as well as who did the interpretation (bilingual worker, contracted interpreter, participant provided interpreter, etc.) when case files are initially started (initial contact, when application is received or at intake), yearly Redetermination/Recertification, and at any time participants request a change in their verbal or written language preference. In addition, DPSS will reinforce to all office directors the expectations for staff on completing the PA 481 and PA 481-A, along with its filing, retention, and imaging requirements. Additionally, the communication will provide instructions for directors to ensure supervisors monitor interview areas to ensure staff is adhering to this policy.

Completed: December 28, 2015

FINDING:

31. General

CORRECTIVE ACTION:

Los Angeles County Department of Public Social Services must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

DPSS RESPONSE:

DPSS released CRM 14-02 to reinforce staff responsibility to provide and document interpretive services offered and/or delivered at each applicant/participant/consumer contact. The memo reinforces to staff that form PA 481, Language Designation, is intended to ensure participants designate their preferred written and spoken language. All staff must ensure that designated verbal and written language preferences of participants are accurately reflected in LEADER (or other appropriate computer systems for their specific program) as indicated on their signed PA 481 forms. In addition, DPSS will reinforce to all office directors, the expectations for staff on completing the PA 481 and PA 481-A, along with its filing, retention, and imaging requirements. Additionally, the communication will provide instructions for directors to ensure supervisors monitor interview areas to ensure staff is adhering to this policy.

Completed: December 28, 2015

VII. STAFF DEVELOPMENT AND TRAINING

LOS ANGELES COUNTY DPSS

REVIEW ELEMENT: INTERVIEW QUESTIONS

FINDING:

32. Division 21, Civil Rights Training.

CORRECTIVE ACTION:

Los Angeles DPSS shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117

DPSS RESPONSE:

DPSS provides Web-based Civil Rights training to all of its employees, which must be completed once every two years. Newly hired employees receive their training during General Orientation. The Web-based format allows all employees to complete subsequent trainings as needed from their respective offices.

Completed: December 3, 2015

VIII. DISCRIMINATION COMPLAINT PROCEDURES

LOS ANGELES COUNTY DPSS

REVIEW ELEMENT: FINDINGS FROM STAFF INTERVIEWS AND PROGRAM MANAGER SURVEYS

FINDING:

33. Discrimination complaint process

CORRECTIVE ACTION:

Los Angeles DPSS shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203

DPSS RESPONSE:

DPSS released CRM 15-02 to reinforce to staff the civil rights discrimination complaint process. All staff must be aware of and be able to direct customers to the civil rights brochures, PUB 13 and PA 2457, as well as form PA 607. All Complaint of Discriminatory Treatment (PA 607) forms completed by customers must be given immediately to the Civil Rights Liaison, who shall forward the complaint to DPSS' Civil Rights Section. Staff was also reminded that participants have the option to call the Civil Rights Complaint Hotline at (562) 908-8501 to initiate the filing of a complaint.

Completed: November 24, 2015

FINDING:

34. Civil Rights Coordinator

CORRECTIVE ACTION:

Los Angeles DPSS shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

DPSS RESPONSE:

DPSS released CRM 15-02 to reinforce to staff the requirement to be knowledgeable about the Department's Civil Rights Policies and Procedures that are designed to ensure compliance with CDSS' Division 21. The memo included Attachment V: Reception Civil Rights Compliance Resources, which contains a comprehensive listing of all mandatory civil rights posters, brochures/pamphlets, and forms, including the State poster titled "Everyone is Different But Equal Under the Law" (Rev. 03/07). This poster informs participants in all State threshold languages of their civil rights, including their right to free interpreter services or a disability accommodation. The name, mailings address and telephone number of the current departmental Civil Rights Coordinator is listed in the poster.

Completed: November 24, 2015

IX. DISCRIMINATION COMPLAINT PROCEDURES

LOS ANGELES COUNTY DPSS

REVIEW ELEMENT: FINDINGS FROM CALL/SERVICE CENTER SITE VISIT AND INTERVIEWS

FINDING:

35. Customer Service Center

CORRECTIVE ACTION:

The Customer Service Center (CSC) answers questions, provides case information, and updates case records of participants. The CSC is a "single point of contact" providing services for all CalWORKs, CalFresh, Medi-Cal, and General Relief program participants. It has proven to be a fast and convenient way for participants to contact a county worker without having to go into the district offices.

The most common problem found in the CSC was the lack of case documentation when participants call for services. In several case comments made by CSC workers, there was no documentation in the case comments suggesting that interpretive services were provided to the participant.

Per Division 21-116.2, referenced in All County Information Notice NO. 1-02-08, counties are required to ask clients their preferred language for oral and written communication and document their preferred language(s) in the client's file. All County Letter 06-20 states that "once the county has been informed that the applicant/recipient needs an interpreter, the county must offer and provide an interpreter at each client contact." The county must document in the client's case file that they offered free interpretive services, if the client accepted or refused interpretive services, who provided the interpretive services, and in what language the interaction was conducted.

DPSS RESPONSE:

DPSS developed and implemented CRM 14-02, dated September 24, 2014, as a result of the 2014 CDSS Civil Rights Compliance Review. As the policy contained in CRM 14-02 also addresses the issues cited in the 2015 CDSS Civil Rights Compliance Review, and the policy reinforcement requirement related to the 2015 citation does not differ, DPSS will release Call-Out 16-01, Civil Rights Compliance Interpretive Services Documentation, referencing the policy reinforcement in CRM14-02.

Target Date: January 29, 2016

DPSS FINAL RESPONSE:

DPSS released Call-Out 16-01, Civil Rights Compliance Language Interpretive Services Documentation for Customer Service Center Eligibility Workers, dated March 21, 2016. The Call-Out was released to provide guidance to CSC Eligibility Workers (CSC EWs) as to the steps they are to follow in documenting language interpretive services when handling calls from Non-English speaking/LEP participants. Additionally, the document

provides specific samples that CSC EWs may employ when entering case comments on language interpretive services in LRS.

Completed: March 21, 2016